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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

2013 NO 20 AM 11:14

WESTERN DISTRICT OF TEXAS
U.S. CLERK'S OFFICE

UNITED STATES OF AMERICA

§ **INDICTMENT**

v.

§ **COUNT ONE:** 18 U.S.C. § 666(a)(2), Paying
§ a Bribe to an Agent of an Organization
§ Receiving Federal Funds;
§
§
§

MARCELO ALVAREZ

BY: _____ DEPUTY

DR 13 CR 1490 AM

THE GRAND JURY CHARGES:

At All Times Material To This Indictment:

1. MARCELO ALVAREZ worked as a surveyor and consultant in Maverick County, Texas.
2. Maverick County contracted with independent engineering and consulting firms to manage large construction projects in the county.
3. MARCELO ALVAREZ corruptly paid money to Maverick County elected officials, including COUNTY COMMISSIONER A and COUNTY COMMISSIONER B in 2010, 2011, and 2012 in order to guarantee that a company received the support of those county commissioners. The support of those county commissioners resulted in that company being selected to perform engineering, project management, and consulting services for the county. The county paid in excess of \$800,000 for those services. MARCELO ALVAREZ was designated as the Resident Project Representative and received payment for his services.
4. Maverick County received more than \$10,000 from the U.S. Department of Homeland Security in 2010, 2011, and 2012.

COUNT ONE
[18 U.S.C. § 666(a)(2)]

5. Paragraphs One through Four above are realleged and incorporated by reference as if fully set forth herein.

6. In each year material to this indictment Maverick County, Texas received in excess of \$10,000 of federal funds.

7. Between on or about January 1, 2010 and on or about December 31, 2012 in the Western District of Texas, the Defendant,

MARCELO ALVAREZ

did corruptly give, offer, and agree to give a thing of value to COUNTY COMMISSIONER A and COUNTY COMMISSIONER B, who were agents or employees of Maverick County, intending to influence and reward COUNTY COMMISSIONER A and COUNTY COMMISSIONER B, in connection with a transaction and series of transactions of Maverick County involving \$5,000 or more, in violation of 18 U.S.C. § 666(a)(2).

A TRUE BILL.

ROBERT PITMAN
United States Attorney

By:

MICHAEL C. GALDO
BRYAN N. REEVES
Assistant United States Attorneys

DR 13CR1490

SEALED:
UNSEALED: XX

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

COUNTY: Maverick USAO #: 2013R11482
DATE: November 20, 2013 MAG. CT. #: MATTER
AUSA: MICHAEL C. GALDO
DEFENDANT: MARCELO ALVAREZ
CITIZENSHIP: U.S.
INTERPRETER NEEDED: No Language: English
DEFENSE ATTORNEY: GREGORY TORRES
ADDRESS OF ATTORNEY:
DEFENDANT IS: At Large DATE OF ARREST: N/A
BENCH WARRANT NEEDED: YES
PROBATION OFFICER: N/A
NAME AND ADDRESS OF SURETY: N/A
YOUTH CORRECTIONS ACT APPLICABLE: NO
PROSECUTION BY: INDICTMENT
OFFENSE: (Code & Description): Count 1: 18 U.S.C. § 666 – Paying Bribe To An Agent of
Organization Receiving Federal Funds.
OFFENSE IS A: FELONY
MAXIMUM SENTENCE: Counts 1: up to 10 years imprisonment; a \$250,000 fine; 3 years of
supervised release; and a \$100 special assessment on all counts.
PENALTY IS MANDATORY: YES & NO
REMARKS: See above W/DT-CR-3